

RHODES, HIERONYMUS, JONES, TUCKER & GABLE, P.L.L.C.
LAWYERS

ONEOK Plaza
100 West 5th Street, Suite 400
Tulsa, Oklahoma 74103-4287
Telephone (918) 582-1173
Fax (918) 592-3390
www.rhodesokla.com

Mailing Address
P.O. Box 21100
Tulsa, Oklahoma 74121-1100

Chris L. Rhodes, III
Bert M. Jones
John H. Tucker
Jo Anne Deaton
Dan S. Folluo
Ann E. Allison
Andrew D. Downing
Bradley A. Jackson
Colin H. Tucker
Kerry R. Lewis

Leslie J. Southerland
Nathan E. Clark
Theresa Noble Hill
Margaret M. Clarke
Carlye O. Jimerson
Bradley S. Shells
Lindsay J. McDowell
Denelda L. Richardson
Maria E. Cervantes

Hal Crouch (1902-1947)
Chris L. Rhodes (1902-1966)
E. D. Hieronymus (1908-1994)
George W. Gable (1918-2000)

— Est. 1931 —

Daniel D. Draper, III
Of Counsel

RhodesHieronymus
O K L A H O M A

Reply to: Theresa Noble Hill
thill@rhodesokla.com

July 10, 2007

Via Email Only

Robert A. Nance
Riggs, Abney, Neal, Turpen, Orbison & Lewis
5801 Broadway Extension, Suite 101
Oklahoma City, OK 73118

Re: *State of Oklahoma v. Tyson*
Our File No. 1790-2

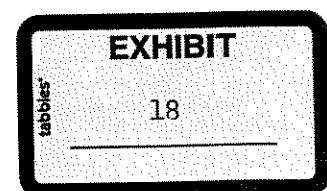
Dear Mr. Nance:

Please find our response to your letter dated July 6, 2007.

The Cargill Defendants' Document Production

We disagree with your statement that the Cargill Defendants have not yet completed their production of documents. If you are referring to our disagreement concerning time and geographic scope, it was the decision of the State's counsel to pursue a Motion to Compel seeking a blanket order that information for all time and all places should be produced in response to its 125 requests, rather than address the specific requests with us in a meet and confer. Judge Joyner was not willing to enter such an order and instead ordered us back to the meet and confer process.

While we remain willing to address your concerns, we have yet to receive your proposed list of document requests for discussion. We look forward to receiving your list in advance of a meet and confer, and we will provide available dates upon receipt of same.



Robert A. Nance
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The State's Document Production in Response to the Cargill Defendants' Discovery

Please advise when you are available for a meet and confer to discuss the State's document production at the remaining agencies outlined in my June 29, 2007 letter. We are surprised to learn that you have not evaluated whether the Department of Health, Department of Mines and Corporation Commission have documents responsive to the Cargill Defendants' discovery. Please refer to my letter of May 22, 2007 to Richard Garren and Trevor Hammons wherein I advised that we expected to find "ESI and documents responsive to our Requests for Production" at these three agencies. See attached, emphasis added. As for the proposed ODAFF production on July 18, 2007, the Defendants are available but have some additional questions regarding that production.

The State's Deficient Response to Cargill's Interrogatories

We still have no response to my letter dated June 18, 2007 addressing the continued deficiencies in the State's supplemental Interrogatory Responses to the Cargill Defendants. See attached. Please add this subject to our meet and confer agenda also.

Sincerely,


THERESA N. HILL

TNH:law